

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I JOHN F. KENNEDY FEDERAL BUILDING BOSTON, MASSACHUSETTS 02203-0001

July 24, 1997

James Shafer, Remedial Project Manager U.S. Department of the Navy Naval Facilities Engineering Command Northern Division 10 Industrial Highway Code 1823, Mail Stop 82 Lester, PA 19113-2090

Re: Responses to EPA Comments on the Work Plan for Source Removal Evaluation at the Old Fire Fighting Training Area

Dear Mr Shafer

I am writing in response to your request for EPA to review the responses to our letter dated June 4, 1997 on the Work Plan for Source Removal Evaluation at the Old Fire Fighting Training Area ("OFFTA") Detailed comments are provided in Attachment A

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the OFFTA. Please do not hesitate to contact me at (617) 573-5777 should you have any questions

Sincerely,

Kymberlee Keckler, Remedial Project Manager

Federal Facilities Superfund Section

Attachment

cc Paul Kulpa, RIDEM, Providence, RI Brad Wheeler, NETC, Newport, RI Susan Svirsky, USEPA, Boston, MA Jennifer Hayes, Gannet Fleming, Harrisburg, PA Ken Finkelstein, NOAA, Boston, MA Steven Parker, Brown & Root, Wilmington, MA



ATTACHMENT A

<u>Page</u>	Comment
pp 3-8 to 3-14, §3.4 3 (5)	EPA recommended that the monitoring well locations be based on sample results in addition to visual observations and FID readings. This has not been addressed
p 3-10, §3.4 3 (6)	The comment raised the concern that a bedrock backfill of bentonite chips may not prevent migration of contaminants. The response merely defends the use of a bentonite and sand mixture. The work plan should include the ratio of bentonite to sand (and a technical justification for said ratio) to ensure that contamination migration from the overburden aquifer to the bedrock will be prevented.
Figure 3-4 (19)	EPA's comment addressed the labeling of sediment and storm sewer samples in Figure 3-4. However, a distinction should be made on the figure to enable the user to distinguish between the sediment and storm sewer water sampling locations. The response states, "the descriptive symbol on the figure may be applicable to both storm sewer water and sediment sampling locations" Unique symbols would be helpful since sediment samples may not be collected at all of the water sampling locations